

## REMARKS

Claims 1-15 were pending in the above-identified application when last examined and stand rejected. The rejection was made final. For the following reasons, Applicants request reconsideration and withdrawal of the final rejection.

Claims 1-6 and 10-15 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Pat. No. 6,753,903 (Lin) in view of U.S. patent No. 6,747,752 (Farago). Applicants respectfully traverse the rejection.

Independent claim 1 distinguishes over the combination of Lin and Farago at least by reciting, "a controller of a type employed in the cable that connects the peripheral to the host computer during normal operation."

Lin discloses an adaptor that provides a direct connection between a digital still camera (DSC) and a printer to eliminate the need for a host computer when printing photographs. Farago is directed to demonstration systems that eliminate the need for host computers during of printer demonstrations, but Farago employs custom ASICs that are specifically designed for the demonstration system. Neither Lin nor Farago suggests a demonstration system using a controller of a type employed in a cable that connects a peripheral to a host computer.

In the final rejection and in the response to Applicants' prior remarks that neither Lin nor Farago disclose or suggest "a controller of a type employed in the cable that connects the peripheral to the host computer during normal operation," the Examiner identified the camera of Lin as corresponding to the host computer recited in claim 1. In particular, in the second paragraph of page 2 of the Final Office Action, the Examiner stated:

the host computer claimed in the claim preamble has one claimed function, to connect to a cable. Further, generally in a printing system with a printer and a cable, the connected host computer device provides the data to be printed by the printer. The camera of Lin (digital still camera 2) acts as a host computer by providing data to be printed by the printer (picture data) as well as being connected to cable 1. During normal operation, the camera provides data to be printed.

Applicants acknowledge that a camera can perform some of the functions required of a host computer. However, the very purpose and goal of Lin is to overcome the limitations that make a camera different from a host computer.

Applicants respectfully submit that the Examiner's interpretation "host computer" as used in claim 1 to include the camera of Lin is improper. In particular, the Examiner's

interpretation is inconsistent with use of the phrase "host computer" in Applicants' specification and inconsistent with the ordinary meaning of "host computer" as that phrase would be understood by those of skill in the art.

Lin and Farago fail to suggest the demonstration system of claim 1 because neither reference suggests use of a controller of the type employed in a cable that connects the peripheral to the host computer during normal operation. As noted in Applicants' prior remarks, use of a controller as recited in claim 1 has the advantages of reducing the cost and design time required to produce a demonstration system because a controller that is already designed and produced in relatively large numbers for printer cables can be easily adapted for a demonstration system. Lin and Farago whether considered separately or in combination fail to suggest systems having the structure of claim 1 or achieving the advantages noted above. Accordingly, claim 1 is patentable over Lin and Farago.

Claim 1 is also patentable over the combination of Lin and Farago because Lin is not analogous art that one of skill in the art would look to as being related to a demonstration system for a printer. See *In re Oetiker*, 977 F.2d 1443, 24 USPQ2d 1443 (Fed. Cir. 1992). In particular, Lin is directed to an adapter for cameras and is thus outside the field of endeavor of Applicants' invention, which is provision of a demonstration system. Further, Lin is not reasonably pertinent to the particular problem of providing a system for in-store demonstration of a printer which was the Applicants' concern. Accordingly, it would not have been obvious at the time Applicants' invention was made to combine Lin and Farago to produce a demonstration system as recited in claim 1.

Independent claim 1 and claims 2-6 and 10, which depend from claim 1, are thus patentable over the combination of Lin and Farago.

Independent claim 11 distinguishes over Lin and Farago by reciting, "A method of making a demonstration system for a printer, comprising ...: connecting to the printer a cable containing a controller that is of a type used in a printer cable that connects the printer to a host computer during normal operation of the printer; storing demonstration data in a memory; and connecting the memory to the cable to enable the controller to read the demonstration data from the memory and format the data for the printer."

Lin and Farago fail to suggest a demonstration system using a controller that is of a type used in a printer cable that connects the printer to a host computer during normal operation. Instead, Lin discloses a camera-printer system using a controller that replaces a host computer, and Farago discloses a demonstration system including custom ASICs for control functions. Claim 11 is thus patentable over the combination of Lin and Farago.

Further, claim 11 is patentable over the combination of Lin and Farago because

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Lin is not analogous art that one of skill in the art would look to for a demonstration system.

Claims 12-15 depend from claim 11 and are patentable over the combination of Lin and Farago for at least the same reasons that claim 11 is patentable over the combination of Lin and Farago.

For the above reasons, Applicants request reconsideration and withdrawal of this rejection under 35 U.S.C. § 103.

Claims 7-9 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lin in view of Farago and further in view of U.S. Pat. No. 5,872,945 (Wett). Applicants respectfully traverse the rejection.

Claims 7-9 depend from claim 1, which is patentable over Lin and Farago for the reasons given above. In particular, Lin and Farago fail to suggest a demonstration system using a controller that is of a type used in a printer cable that connects the printer to a host computer during normal operation. Wett is directed to a bus translator, particularly, for translation from an MX bus to a system bus protocol. Wett does not disclose or suggest either a demonstration system or a controller that is of a type used in a printer cable that connects the printer to a host computer during normal operation. Accordingly, Wett does not provide the elements of claim 1 that are missing from the combination of Lin and Farago. Claim 1 and claims 7-9, which depend from claim 1, are thus patentable over the combination of Lin, Farago, and Wett.

For the above reasons, Applicants request reconsideration and withdrawal of the rejection under 35 U.S.C. § 103.

In summary, claims 1-15 are pending in the application and remain in the form previously examined. For the above reasons, Applicants respectfully request withdrawal of the final rejection and allowance of the application including claims 1-15.

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Respectfully submitted,



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